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File No.: 1224-1

October 26, 2022

VIA ECF ONLY

Hon. Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

RE: Rachel Weingeist v. Tropix Media & Entertainment, et al.
Civil Action No.: 1:20-cv-00275-ER

Dear Judge Ramos:

This Firm represents Defendants/Counterclaimants/Third-Party Plaintiffs, Tropix Media & Entertainment, Tropix Holdings LLC, Tropix Inc. and Mario Baeza relative to the above-referenced action.

On October 18, 2022, the Court directed that this Firm file the Motion to Withdraw as Counsel and Extend Time for Defendants to serve discovery demands by October 25, 2022 and expend upon the reasons the Firm is seeking to withdraw in the motion.¹ There have been significant issues that have arisen between Defendants and the Firm that are outlined in the Affirmation of Counsel in the Motion to Withdraw. At our conference on October 18, 2022, the Court indicated that the Affirmation in support of our motion may be filed “under seal” as it attaches attorney-client privileged documents.

By way of this Letter Motion, this Firm respectfully requests that the Affirmation in support of the Motion to Withdraw as Counsel be filed under seal F.R.C.P. 5.2 and Your Honor’s Individual Rule 3 (i-ii).

¹ This deadline was extended to October 26, 2022.

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We thank Your Honor for the Court's consideration.

Respectfully submitted,

/s/Geoffrey D. Mueller

GEOFFREY D. MUELLER

GDM/sv

Cc: Jerome Noll, Esq. (*via ECF*)
 Steven J. Cohen, Esq. (*via ECF*)
 Clients (*via electronic mail*)